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Supreme Court No. 94798-8 (consolidated with No. 94970-1)

Court of Appeals No. 48299-1-II

SUPREME COURT OF THE STATE OF WASHINGTON

In re the Dependency of S.K.-P., Minor Child,

Appellant,

AMICI CURIAE BRIEF OF THE CENTER FOR CHILDREN &
YOUTH JUSTICE AND THE MOCKINGBIRD SOCIETY

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I. INTRODUCTION & ISSUE PRESENTED

Division II of the Washington State Court of Appeals held that children in dependency proceedings do not have a categorical due process right to court-appointed counsel and that juvenile courts should use the *Mathews* balancing test when evaluating a dependent juvenile's request for court-appointed counsel. *Matter of Dependency of S.K.-P.*, 200 Wn. App. 86, 401 P.3d 442 (2017). The issue of whether dependent children have a categorical due process right to court-appointed counsel is now before the Washington Supreme Court.

Appointing counsel on a case by case basis undervalues and is insufficient to protect dependent children's weighty physical and other liberty interests. Children's liberty interests, including their physical liberty interests, are real life and consequential burdens. They are at greater risk in a dependency proceeding than their parents' and they are at greater risk than in a termination proceeding. Dependency proceedings are unique in that once children are taken into State custody, every aspect of their life becomes uncertain, including whether they will have a safe place to sleep, whether they will be put in multiple placements, whether they will have to switch schools, and whether they will see any of their family members anymore. The alleged procedural safeguards in place to protect a dependent child's physical liberty interests are likewise insufficient—they may protect some dependent children in some situations, but they too often fall short.

There can be no doubt that children’s physical liberty is “severely implicated” in dependency actions. William Wesley Patton, *Searching for the Proper Role of Children’s Counsel in California Dependency Cases or the Answer to the Riddle of the Dependency Sphinx*, 1 J. CENTER FOR CHILD. & CTS 21, 24 (1999). In fact, most states agree, and Washington State is one of just 18 states that do not provide children a categorical right to court-appointed counsel in dependency proceedings. *Matter of Dependency of Lee*, 200 Wn. App. 414, 449, 404 P.3d 575 (2017).

Ripe before the Court is the issue of whether children have a right to court-appointed counsel in dependency proceedings. *Amici*, who have significant expertise in implementing statewide improvements in the child welfare justice system and who are able to attest firsthand that the overwhelming majority of children in Washington State are negatively impacted in dependency proceedings, respectfully request that the Court find with a resounding yes, that each and every child does indeed have a right to court-appointed counsel in dependency proceedings.

II. IDENTITIES AND INTERESTS OF AMICI

The identities and interests of *amici* in the current matter are set forth in *amici*’s Motion for Leave to File *Amici Curiae* Brief.

III. STATEMENT OF THE CASE

Amici adopt S.K.-P.’s statement of the case.

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IV. ARGUMENT

Amici posit three separate arguments in this brief. First, *amici* address how it is well-recognized that children have substantial liberty interests, including physical liberty interests, which necessitate due process protections in the form of court-appointed counsel in dependency proceedings. These interests must be given the same weight by the Court that dependent children are burdened with in their daily lives. Second, *amici* explain how children's physical liberty interests are different and greater than their parents', and are at greater stake in dependency proceedings. Third, *amici* explain the shortcomings of Division II's opinion and explain how the procedural safeguards allegedly in place for dependent children fail to comply with due process. Throughout this brief, *amici* also provide firsthand examples of how the State's custody over a dependent child severely and tangibly impacts the child's physical and other liberty interests and how, when appointed counsel, the child's physical liberty interests receive due protection.

A. Children have real and consequential protected liberty interests that necessitate strong due process protections.

It is already well-settled by both the United States Supreme Court and the Washington Supreme Court that children have physical liberty interests at stake when there is state intervention. Indeed, when a child's physical liberty interests are infringed upon, the "essentials of due process

and fair treatment” are required under the law. *In re Gault*, 387 U.S. 1, 30, 87 S. Ct. 1428, 18 L. Ed. 2d 527 (1967); *see also In re Dependency of MSR*, 174 Wn.2d 1, 17-18, 271 P.3d 234 (2012) (a child’s liberty interest in a dependency proceeding is “at least as great as” the parent’s).

As recognized by Washington courts, “Children who are removed from their parents’ care face a loss of physical liberty and may be forced to change homes, schools, and care facilities. Such movement may cause children significant harm.” *Matter of Dependency of Lee*, 200 Wn. App. 414, 450, 404 P.3d 575 (2017). Indeed, when a child is physically removed from his or her home, that child is left “powerless and voiceless, to be forced to move from one foster home to another.” *Id.* at 451 (quoting *In re Dependency of M.S.R.*, 174 Wn.2d at 15). Furthermore, “While an adult may have an understanding of substantive and procedural issues, and court process, children are at great risk of misunderstanding both.” Amy E. Halbrook, *Custody: Kids, Counsel and the Constitution*, 12 Duke J. Const. L. & Pub. Pol’y 179, 212 (Spring 2017). And, despite the State’s best efforts, mistakes and errors may be made on their behalf, which further increases the risks to a dependent child. *Id.* at 212-13.

Dependent children’s physical liberty interests are at risk in even more substantial ways. These other risks include “abuse, neglect, permanently severed relationships, or even death for a child.” 12 Duke J. Const. L. & Pub. Pol’y 179, 211. Dependent children have “an interest in

being free from harm” and, despite the “State’s best and sincere efforts, children are not always free from harm once the State orders their placement.” *Matter of Dependency of Lee*, 200 Wn. App. at 451 (quoting *In re Dependency of S.K.-P.*, 200 Wn. App. 86, 115-16, 401 P.3d 442 (2017)); see also *Morgan v. DSHS*, 99 Wn. App. 148, 151-52, 992 P.2d 1023 (2000) (court found that foster care provider left developmentally delayed foster child alone at ice skating rink, used profane terms in regards to the foster children, and slapped foster children in the face).

Deonate’s story demonstrates the concrete physical liberty interests at stake for a dependent child. Deonate, an alum of Washington foster care, first obtained counsel when he was 12 years old, even though he had been in dependency proceedings since birth. Before Deonate obtained counsel, he did not know what a dependency proceeding was, or that the proceeding impacted his life and quality of care. Deonate “didn’t know that he could speak up if he didn’t feel good in a placement” and having “legal representation gave him more power and the chance to speak up about his experiences in care.” *Defending Our Children: A Child’s Access to Justice in Washington State, 2016 Status Report*, Children and Youth Advocacy Clinic at the University of Washington, p. 5 (2016), available at <http://cdcasa.org/wp-content/uploads/2017/01/UW-Study-2016-Defending-Our-Children.pdf>. As stated by Deonate, “Once I got an attorney, I noticed that the neglect and abuse I experienced in care dropped

significantly.” *Id.* Deonate’s story shows that dependent children are subject to abuse and neglect, and only when an attorney is appointed, may dependent children have someone who must speak up on their behalf to stop such maltreatment.

In addition to physical liberty interests, children have many other liberty interests at stake in dependency proceedings. One is the “right to freedom of personal choice in matters of family life[.]” *Matter of Dependency of Lee*, 200 Wn. App. at 451 (citing to *In re Dependency of T.R.*, 108 Wn. App. 149, 154, 29 P.3d 1275 (2001)). Dependency proceedings also affect a child’s fundamental liberty interest in “having the affection and care of his [or her] parents.” *Id.* at 450-51 (quoting *Moore v. Burdman*, 84 Wn.2d 408, 411, 526 P.2d 893 (1974)). Furthermore, a dependent child is not only at risk of losing a parent, but also relationships with siblings, grandparents, aunts, uncles, and other extended family. *Id.* at 451. There can be no doubt that the Washington legislature has recognized just how important these relationships are to a child. *Id.*; *see also* Ch. 13.34 RCW.

From the moment a child is taken into custody by the State and placed in a foster home, strangers appointed by the State assess and decide what is best for the child, including where they can go to school, whether they can have cell phones, who they can spend time with, what extracurricular activities they are permitted to be involved in, whether they

can obtain a driver's license, and countless other life decisions, both big and small. Elizabeth Fordyce, *Too Young to Understand, But Old Enough to Know Better: Defining the Rights of Transition-Age Youth in the Child Welfare System*, 94 Denv. L. Rev. 567, 569 (Fall 2017). There can be no doubt that children's liberty interests, including their physical liberty interests, are palpable in their daily lives and are gravely endangered when they are placed in dependency proceedings.

B. Although the liberty interests may differ between child and parent, a dependent child's liberty interests are more weighty and at greater risk.

Division II acknowledges that children's liberty interests are equal to those of parents, but claims that those interests are "very different" from the parents' interest. *In the Matter of the Dependency of S.K.-P.*, 200 Wn. App. at 109. Even if a child's interests differ from those of the parents', such differences do not dictate that children should be categorically denied the right to counsel in dependency proceedings. On the contrary, a child's liberty is at far greater risk in a dependency proceeding.

The Washington Supreme Court has stated that a child's due process liberty interest in a dependency proceeding is "at least as great as" the parent's liberty interest. *In re Dependency of MSR*, 174 Wn.2d 1, 17-18, 271 P.3d 234 (2012).

Unlike the parent, the child in a dependency or termination proceeding may well face the loss of a physical liberty interest both because

the child will be physically removed from the parent's home and because if the parent-child relationship is terminated, it is the child who may become a ward of the State. It is the child, not the parent who may face the daunting challenge of having his or her person put in the custody of the State as a foster child, powerless and voiceless, to be forced to move from one foster home to another.

Id. (emphasis added). The dependent child, not the parent, is the individual that is taken into State custody. The dependent child, not the parent, will suffer the real-world harms that can accompany a loss of physical liberty.

The Washington Legislature has also recognized that dependent children's rights are *superior* to those of the parents: "When the rights of basic nurture, physical and mental health, and safety of the child and the legal rights of the parents are in conflict, the rights and safety of the child should prevail. In making reasonable efforts under this chapter, the child's health and safety shall be the paramount concern." RCW 13.34.020 (emphasis added). Even though the interests of the parents and the children may differ, the children's interests and the threat to their preservation is greater.

In addition to being taken into State custody, unlike the parents, dependent children are routinely moved from placement to placement, which, as recognized by the Washington Supreme Court, "may create or exacerbate existing psychological conditions, notably reactive attachment

disorder.” *Braam ex rel. Braam v. State*, 150 Wn.2d 689, 694, 81 P.3d 851 (2003) (court concluded that “foster children have a substantive due process right to be free from unreasonable risk of harm, including a risk flowing from the lack of basic services, and a right to reasonable safety”); *see also* RCW 74.13.310 (“Placement disruptions can be harmful to children by denying them consistent and nurturing support.”). Furthermore, unlike the parents, children do not have the ability to care for themselves. *See Schall v. Martin*, 467 U.S. 253, 265, 104 S. Ct. 2403, 81 L. Ed. 2d 207 (1984). Even more troubling is that dependent children are potentially subject to placement by the State in “institutional facilities where their physical liberty is greatly restricted.” *Kenny A. ex rel. Winn v. Perdue*, 356 F. Supp. 2d 1353, 1360-61 (N.D. Ga. 2005) (court found that foster children had a categorical right to counsel in deprivation proceedings).

Samuel’s story provides a firsthand account of how a dependent child’s physical liberty interests are weightier and at greater risk than the parents’ liberty interests. Samuel’s foster parents kicked him out of their home and put all of his belongings on the street, including a computer that Samuel had purchased with his own money. As a result, his belongings, including his prized computer, were stolen. Fortunately, however, Samuel had counsel appointed (although it took approximately a year after Samuel’s request for the court to appoint counsel), who helped ensure that he was reimbursed for his stolen possessions. However, Samuel lost his attorney,

and to make matters worse, it happened right when he was going through a placement change. As stated by Samuel, “I felt like I was in limbo, because even though I had a social worker in Wenatchee, I was placed almost two hours away, and so my communication with my social worker wasn’t that great and I didn’t have my attorney anymore to talk to at all.” *Defending Our Children: A Child’s Access to Justice in Washington State, 2016 Status Report*, p. 10. Thereafter, the State frequently moved Samuel to different placements, and although he was returned to Wenatchee, he only stayed there for one month, and then after moving in and out of relative placements, he was moved to Spokane where, again, he was moved multiple times. *Id.*, p. 10-11. Sadly, without an attorney, Samuel stopped seeing the value in expressing his opinion and he began to feel lost in the system. *Id.*, p. 11.

Samuel’s story demonstrates that children are “uniquely situated in a worse position than the parents[.]” 12 Duke J. Const. L. & Pub. Pol’y 179, 214-15. Their liberty interests in familial relationships and physical liberty is at stake and, unlike their parents, they do not have the ability to assert their desired interests or the ability to hire their own attorney. Children are unfortunately frequently not heard, or if they are heard, they are not heard adequately. *Id.* Children’s liberty interests are greater, far more consequential in their daily lives, and at greater risk than those of the parents’. For these reasons, it is even more imperative that each dependent child be appointed counsel.

C. The procedural safeguards outlined by Division II fail to comply with due process.

Division II focuses much of its opinion on procedural safeguards that allegedly protect dependent children's liberty interests. However, a closer look at these procedural safeguards and their actual application show that they fall short of protecting a dependent child's liberty interests. Relying on these procedural tools without appointing an attorney to advocate for a child undervalues the importance of the child's interests and the jeopardy he or she faces in a dependency proceeding.

1. A statute requiring the State to ensure the safety and best interests of the child does not guarantee protections.

One such procedural safeguard cited by Division II is that the State is charged with "[e]nsuring that the safety and best interests of the child are the paramount considerations when making placement and service delivery decisions." *In the Matter of the Dependency of S.K.-P.*, 200 Wn. App. at 110 (quoting RCW 74.14A.020(3)). Such a broad sweeping statute, although laudatory in theory, does not constitute a procedural safeguard that children can rely on in their daily lives when no advocate is available to ensure compliance and the State cannot always ensure the safety and best interests of the child.

By way of example, where children will live is determined by caseworkers, agency officials, and judges—not parents, relatives, or others who have some lasting connection to them. These state employees make

these decisions under a great deal of competing pressures. One such pressure is limited resources. Children may be moved from placement to placement for reasons that have nothing to do with what is best for that child. Children “are moved because beds need to be freed for an incoming sibling group, or because the foster parent is retiring and moving out of state, or because the foster parent was late for court and the judge ordered the agency to move the child.” Erik S. Pitchal, *Where Are All the Children? Increasing Youth Participation in Dependency Proceedings*, 12 U.C. Davis J. Juv. L. & Pol’y 233, 254 (Winter 2008). Although the State may attempt to do its very best in ensuring safe placement decisions for dependent children, too many dependent children like Deonate and Samuel are placed in unsafe environments or moved far too often.

2. Other appointed advocates do not offer the full protections that attorneys offer.

Division II also points to another alleged procedural safeguard, RCW 13.34.100(1), which requires a GAL to be appointed unless for good cause shown the juvenile court concludes it is not necessary. *Matter of Dependency of S.K.-P.*, 200 Wn. App. at 110. First, the juvenile court does not assign a GAL until after the initial shelter care hearing. *Id.* (citing to RCW 13.34.065(4)(g)). And, as recognized by Division II, although a child may be appointed a GAL, a “GAL’s role is limited.” *Matter of Dependency of S.K.-P.*, 200 Wn. App. at 110. A GAL cannot “summarize or paraphrase

pleadings and court orders, explain the legal implications of these documents, or give legal advice, because a GAL does not represent the child as an attorney represents a client.” *Id.* Indeed, child advocates have “no attorney-client privilege with the child, [and] are in a position to deny the child the right to discovery, protective orders, motions, persuasive writing and expressed-wishes participation in hearings and trial.” 12 Duke J. Const. L. & Pub. Pol’y 179, 215-16.

Even more troubling is that the child advocate is allowed to make arguments against the child’s wishes, and “the child has no way to express his or her wishes or confront the GAL who has become the child’s adversary.” *Id.* at 216. Case in point: courtroom observers recently found that CASA’s and GAL’s “only presented arguments to support the child’s position 30% of the time.” *Defending Our Children: A Child’s Access to Justice in Washington State, 2016 Status Report*, p. 22 (2016).

This procedural safeguard further fails to comply with due process because children are not always appointed a GAL or other type of similar advocate. A 2016 report consisting of dependency hearing observations demonstrates that approximately 23% of children across King, Snohomish and Pierce counties had no appointed advocate whatsoever, whether that advocate was a GAL, an attorney, or a CASA. *Defending Our Children: A Child’s Access to Justice in Washington State, 2016 Status Report*, p. 13 (2016). This same report also shows that an additional 5% of children had

a CASA or GAL that “did not contribute at all to the court hearing – neither through filing a report, expressing a position on any issue at the hearing, nor presenting any new information for the court.” *Id.* Relying on a supposed procedural safeguard that is not even put in place nearly a quarter of the time does not correctly value the interests at stake.

Charlie’s story sheds light on this very topic. Charlie, who is in foster care, has severe developmental disabilities and relies on a wheelchair for mobility. His wheelchair was missing some important pieces, including the head strap, and Charlie’s school was having to use duct tape to secure his head and prevent him from falling out of the chair. Although Charlie’s volunteer CASA and social worker knew of the problem, they never brought the issue to the court’s attention. An attorney was finally appointed to serve Charlie, and that attorney coordinated with all of the parties to make sure that the missing strap was replaced immediately. *Defending Our Children: A Child’s Access to Justice in Washington State, 2016 Status Report*, p. 26 (2016).

In Charlie’s case, like many others, the CASA and social worker were ineffective and it was only when Charlie was appointed an attorney did he obtain the proper equipment necessary to ensure that his liberty interests in mobility and education were fully realized. In short, GAL’s and CASA’s are unable to provide certain protections and in many instances, like Charlie’s, are unwilling to advocate for the child.

3. *A request for counsel is not always granted, and judges rarely use their discretionary power to appoint counsel.*

Division II also notes another alleged procedural safeguard in RCW 13.34.100(7), which allows judges to appoint counsel to children on their own initiative or upon request. However, this statute is permissive—not mandatory. See RCW 13.34.100(7)(a) (“The court may appoint an attorney....”). In fact, across Snohomish, King and Pierce counties, the discretionary appointment of counsel at hearings occurred for less than 1% of all children without advocates. *Defending Our Children: A Child’s Access to Justice in Washington State, 2016 Status Report*, p. 28 (2006).

Division II also points to RCW 13.34.100(7)(c) as a procedural safeguard. This statute provides that children must be notified on their 12th birthday, and at least annually thereafter, of their right to request an attorney. *Matter of Dependency of S.K.-P.*, 200 Wn. App. at 111. However, no part of this statute states that the court must provide the requesting child counsel, and the statute provides no guidance as to under what circumstances the court should grant these requests. *Id.*; see also *Defending Our Children: A Child’s Access to Justice in Washington State, 2016 Status Report*, p. 4 (2006).¹ In fact, when a child has no advocate at all, the issue of appointing an attorney in a dependency proceeding is almost never

¹ Also, what if the dependent child is unable to articulate a request for counsel, like in Griffin’s case? See *infra*.

brought up. *Id.*, p. 27. Relying on an uncertain notification only at an advanced aged does not correctly value or protect children's interests.

Griffin is just one recent example of a dependent child who was not appointed counsel by the trial court. Griffin is a medically fragile child who requires 24-hour care by individuals who closely understand his needs. He was born with several medical conditions and is functionally blind, nonverbal, nonambulatory, and exhibits self-injurious behavior. *Matter of Dependency of Lee*, 200 Wn. App. at 419. Griffin was removed from his home and taken into State custody where he moved from the Ashley House in Enumclaw to the Children's Country Home, and was then returned to the Ashley House after the Department sought to place Griffin in a care facility across the state near Walla Walla. *Id.* at 429.

Division I found that Griffin, who was unable to express a desire for counsel, was subject to a great risk of harm as he faced removal from his home, separation from his parents, separation from his brothers (who he is particularly close with), and the risk of moving from one care facility to the next for the rest of his life. *Id.* at 451. The risk of harm to Griffin was not just a hypothetical—the State had already removed him from his home and “placed him in the care of organizations that provided inadequate treatment resulting in broken bones and failed medical procedures.” *Id.*

Division I also found that the appointment of a CASA in Griffin's case was insufficient because the CASA “is not required to be an attorney,

does not protect the legal rights of the child, and does not represent the child as an attorney represents a client.” *Id.* at 452-53 (quoting *S.K.-P.*, 200 Wn. App. at 110-11).² Griffin’s parents were also insufficient advocates for him because parents in dependency proceedings have their “own goals” and, “although their desired placement outcomes may be aligned with the child’s wishes, there are inherent conflicts of interest throughout the proceeding.” *Id.* at 453 (quoting *S.K.-P.*, 200 Wn. App. at 116 n. 19). Indeed, the “very nature of a dependency often pits a parent’s interest against the child’s.” *Id.*

Division I therefore concluded that independent counsel was imperative for Griffin because counsel could have assisted Griffin in many ways, including appealing the denial of certain services, applying for a Medicaid waiver, and representing Griffin at administrative hearings. Independent counsel also could have brought suit to require the State to provide the necessary in-home care that Griffin so desperately needed. *Id.* at 453-54. Fortunately for Griffin, the trial court was instructed to appoint counsel for him. Sadly though, Griffin’s story is not unique and there are too many cases in which a dependent child never has an opportunity to have counsel represent him or her.

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² In addition, because CASA programs rely on volunteers, it can often take time to recruit and match a volunteer CASA with a family. *Defending Our Children: A Child’s Access to Justice in Washington State, 2016 Status Report*, p. 14 (2016).

4. *Dependent children are at risk of being placed in an institution.*

Finally, Division II claims that a child's physical liberty interest does not rise to the level of requiring court-appointed counsel in every dependency proceeding because, in dependency proceedings, a child who is removed from her home is not placed in an institution such as a juvenile detention center or a mental health facility and, therefore, the child's personal freedom is not curtailed. *Matter of Dependency of S.K.-P.*, 200 Wn. App. at 113. This is simply not accurate. "Throughout the dependency process, a child is subject to the possibility of being placed in a group home or other institutional setting (*i.e.*, a locked mental health facility) in which her physical liberty may be compromised." 12 U.C. DAVIS J. JUV. L. & POL'Y 233, 247 (emphasis added). In fact, the Washington Supreme Court has recognized that children in state custody risk being held in contempt and subject to detention or other court sanctions through RCW 13.34.165 or through the court's inherent power. *In re Dependency of A.K.*, 162 Wn.2d 632, 652, 174 P.3d 11 (2007) (holding that courts are permitted to order detention for foster children that repeatedly run away from their placements as dictated by the state). Furthermore, children involved in juvenile delinquency proceedings are not always confined to detention. Sometimes they are released or are given other punishments that do not involve confinement. Likewise, just because children are not always given

an institutional placement in the course of dependency proceedings does not dictate that counsel is unnecessary to protect their liberty interests.

As well-meaning as these alleged procedural safeguards are, in application they cannot effectively protect the enormous liberty interests at stake for dependent children. The stories of real children show that these rules and procedures require legal advocacy in order to be meaningful to all dependent children. Without a guarantee of counsel, too many dependent children are left without an advocate or sufficient protection in a situation where their unique physical liberty interests are gravely at risk.

V. CONCLUSION

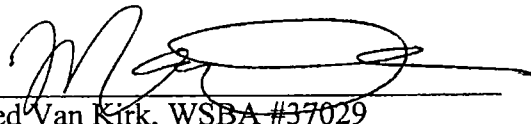
When the State places children in dependency proceedings, everything for them is suddenly at risk. They may be placed in an unsafe home where they are subject to neglect and abuse like Deonate. They may have to switch schools or be moved across the state like Samuel. They may be forced to cease contact with close family members, like Griffin, who was unable to have visitation with his brothers. And they may not have anyone advocating for them for even the most basic needs, like Charlie.

The time is now for the Court to ensure that children's basic due process rights are met when the State takes custody of them and places them into dependency proceedings. Unfortunately, neither the Court nor the State, even with their best intentions, can predict how decisions made during the course of a dependency proceeding may have long term implications for

a child's physical liberty. It is therefore imperative that a child's right to counsel attach early and consistently so his or her constitutional rights are given meaningful protection and effectively safeguarded. Accordingly, *amici* urge this Court to recognize a constitutional right to counsel for children in dependency proceedings.

RESPECTFULLY SUBMITTED this 7th day of February, 2018.

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CERTIFICATE OF SERVICE

I hereby certify that on February 7, 2018, I caused to be electronically filed the foregoing *AMICI CURIAE* BRIEF OF THE CENTER FOR CHILDREN & YOUTH JUSTICE AND THE MOCKINGBIRD SOCIETY with the clerk of the court using the Washington State Appellate Court Web Portal which causes participants in this matter to be served by electronic means.

Dated this 7th day of February, 2018, at Seattle, Washington.

GARVEY SCHUBERT BARER

By: 
Kelly M. Mueller
Legal Assistant

GSB:9203053.3

GARVEY SCHUBERT BARER

February 07, 2018 - 3:00 PM

Transmittal Information

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Superior Court Case Number: 14-7-01413-7

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